

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
AT KNOXVILLE**

RE:)	
)	
CARL DAVID FLATFORD and)	
KATHY STARR FLATFORD,)	CHAPTER 7
)	CASE NO.:06-32395
)	
Debtors.)	

**AMENDED MOTION FOR APPLICATION FOR ORDER DIRECTING PAYMENT
OF FUNDS TO CREDITOR/CLAIMANT PURSUANT TO
11 U.S.C. SECTION 347 AND 28 U.S.C. SECTIONS 2041 ET. SEQ.**

Santander Consumer USA as assignee of CitiFinancial Auto Corporation (the "Claimant"), acting by and through its attorney in fact, American Property Locators, Inc. in the captioned case respectfully requests as follows:

1. Claimant was a creditor of the Debtors and was due to receive and the Trustee did, in fact, make a distribution from the estate to the Claimant in the amount of \$1,066.87. The Claimant was not located and the funds of the Claimant were paid into the Court pursuant to 11 U.S.C. § 347.

2. Pursuant to 11 U.S.C. § 347 and chapter 129 of title 28, United States Code, the Claimant requests that the Court issue an order directing payment to the Claimant and that payment be made to Santander Consumer USA as assignee of CitiFinancial Auto Corporation, in care of David H. Jones as attorney for American Property Locators, Inc., Kennerly, Montgomery & Finley, P.C., 550 Main Street, 4th Floor, Knoxville, Tennessee, 37902.

3. A copy of the Limited Power of Attorney whereby Santander Consumer USA as assignee of CitiFinancial Auto Corporation granted American Property Locators, Inc. power of attorney to act for the limited purpose of recovering unclaimed funds in this bankruptcy case in the amount of \$1,066.87 is attached hereto as "Exhibit 1".

4. An Affidavit of Creditor Regarding Ownership of Accounts ("Affidavit") indicating that Santander Consumer USA purchased certain accounts from CitiFinancial Auto Corporation, including the account that is the subject of the claim identified herein is attached hereto as "Exhibit 2". The Affidavit also verifies that Santander Consumer USA is the owner of the particular claim and is entitled to the recovery of the unclaimed funds described herein.

5. A copy of a photo identification of Mark McCastlain, Senior Vice President, Treasurer of Santander Consumer USA is attached hereto as "Exhibit 3".

WHEREFORE, Claimant requests that the Court issue an order directing payment of the funds held by the Court for the Claimant in this case and for such further and other relief as is just and appropriate.

Respectfully submitted this 22nd day of January, 2014.

/s/ David H. Jones

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Attorney for American Property Locators, Inc.
as Attorney In Fact for Santander Consumer
USA as assignee of CitiFinancial Auto
Corporation

CERTIFICATE OF SERVICE

I hereby certify that on January 22, 2014 I have mailed a true and correct copy of the foregoing APPLICATION FOR ORDER DIRECTING PAYMENT OF FUNDS TO CREDITOR/CLAIMANT PURSUANT TO 11 U.S.C. SECTION 347 AND 28 U.S.C. SECTIONS 2041 ET. SEQ. to:

United States Attorney
Attn: Civil Process Clerk
800 Market Street, Suite 211
Knoxville, TN 37902

/s/ David H. Jones
David H. Jones